## **REMARKS**

Claims 1-7 and 10-29 are pending in the application. Claims 8 and 9 were previously canceled. Claims 25-29 were previously added.

Claims 1, 10, 15, and 20-29 are rejected under 35 USC 102(a) as being anticipated by U.S. Patent No. 5,911,776 to Guck, hereinafter "Guck". Applicant respectfully traverses this rejection.

Claim 1 provides a method for composing a computer message. The method includes presenting a message composition area for entry of an unformatted message into at least one text field and for entry of data into at least one selection field associated with the text field, and a message format selector for selecting an output format from a plurality of formats. The method also includes, in response to entry of an unformatted message into the message composition area and selection of one of the output formats, converting the unformatted message to form a formatted message from the text field with format tags. The formatted message is formatted according to the one of the output formats. Format tags are assigned to the formatted message and the formatted message is structured for display based on a selection field data from the at least one associated selection field.

Guck discloses a system for creating and storing an original document, having a first format, in an object-oriented database (col. 4, lines 41-43). The system stores a document, created by a user in a first format, as a source object (col. 4, lines 3-5). The source document can be submitted as a "virtual file" object having additional characteristics (col. 4, lines 5-10). Virtual file objects are organized in named directories (col. 4, lines 10-12). If the source object is a message such as an email message, it is stored as a "virtual message" object (col. 4, lines 13-20).

In use, a user creates or obtains source information in the form of a source document, which is then stored in a server (col. 6, lines 52-55). The object created to

hold the document's content is a resource object, belonging to a given type and inserted into subtypes based on characteristics of the document (col. 7, lines 33-49). An example of a type is "Virtual File", and an example of a sub-type is "Plain Text File" (col. 7, lines 50-55).

Conversion utilizes a "converter" object located in a database, each of which has the ability to convert a file from one particular format to another particular format (col. 4, lines 48-50). In order to convert the format of a resource object, the system attempts to locate a converter object that is of a type compatible with the format of the resource object and the desired format of an output resource (col. 10, lines 31-35). The converter type is divided into subtypes that represent "output resource" types and "input resource" types, and have additional properties that further define the type of conversion the objects will perform (col. 10, lines 35-53). Converter types are, for example, assigned an "input MIME type" and an "output MIME type", which defines the format of data that the converter object can receive and the format of data the converter object can generate (col. 10, lines 53-57). The converter type hierarchy is populated by numerous converter objects, each of which perform a specific conversion (col. 10, lines 84-66).

The system locates a suitable converter object which will convert the document's content into a format that is compatible with the client's protocol, and the resulting transformed content is returned to the client (col. 12, lines 1-9).

Thus, Guck discloses a system that converts a document from a first format to a second format by utilizing various converter objects from a source document's format to a requested format to be delivered to a client. The MIME protocol disclosed in Guck allows for selection of different formats. However, neither the disclosed converter objects nor the MIME protocol acts to change a displayed structure of the original document or source file. The displayed structure of the converted file is not changed from the displayed structure of the original source document.

Thus, Guck does not disclose a method including "converting said unformatted message to form a formatted message from said text field with format tags, wherein said formatted message is formatted according to said one of said output formats, and wherein format tags are assigned to said formatted message and said formatted message is structured for display based on a selection field data from said at least one associated selection field" as recited in claim 1.

Therefore, Guck does not disclose or suggest the elements of claim 1. Thus, Guck does not anticipate claim 1.

Claims 10, 15, 20, 21 and 23 include recitals similar to those of claim 1. For at least reasoning similar to that provided in support of claim 1, claims 10, 15, 20, 21 and 23 are patentable over Guck.

Claim 22 depends from claim 21, and claim 24 depends from claim 23. For at least reasoning similar to that provided in support of claims 21 and 23, claims 22 and 24 are patentable over Guck.

Claim 25 includes a method for composing a computer message. The method includes presenting a first message composition area including a first formatted display area, and a second message composition area.

The method also includes, in response to entry of a first unformatted plain text message into the first message composition area and a selection of one of the output formats, converting the first unformatted plain text message to form a first formatted message with format tags of the one of the output formats.

The method further includes, in response to an entry of a second unformatted plain text message into the second message composition area, converting the first unformatted plain text message to form a first formatted message with format tags of the one of the output formats, and converting a second unformatted plain text message

to form a second formatted message with format tags of the one of the output formats. The method still further includes presenting the first and second formatted messages as a concatenated complete message for display in the formatted message display area.

As discussed above, Guck discloses conversions that take place from one format to another format, but with no changes of presentation or structure within the messages. Guck does not disclose entering a first message into a first message composition area that includes a formatted message display area, and a second message into a second message composition area. Guck further does not disclose converting the first message to form a first formatted message and converting the second message to form a second formatted message, and presenting the first and second formatted messages as a concatenated complete single message for display in the formatted message display area.

Therefore, Guck does not disclose or suggest the elements of claim 25. Thus, Guck does not anticipate claim 25.

Claims 26-29 include recitals similar to those of claim 1. For at least reasoning similar to that provided in support of claim 1, claims 26-29 are patentable over Guck.

For the reasons set forth above, the rejection of claims 1, 10, 15 and 20-29 under 35 U.S.C. 102(b) as anticipated by Guck is overcome. Applicant respectfully requests that the rejection of claims 1, 10, 15 and 20-29 be reconsidered and withdrawn.

Claims 2-7, 11-14 and 16-19 are rejected under 35 USC 103(a) as being unpatentable over Guck in view of U.S. Patent No. 6,230,173 to Ferrel et al., hereinafter "Ferrel". Applicant respectfully traverses this rejection.

Ferrel is directed towards a story editor that can save files in a Multimedia Document Format (MDF) file (abstract). These multi-media files are then used to provide content for displayed on-line titles. (col. 3, lines 43-45). However, Ferrel does

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not make up for the deficiencies of Guck as Guck relates to claims 1, 10, and 15. Therefore, claims 1, 10, and 15, and by virtue of their dependency, claims 2-7, 11-14, and 16-19 are all patentable over the cited combination of Guck and Ferrel.

For the reasons set forth above, the rejection of claims 2-7, 11-14 and 16-19 under 35 USC 103(a) as being unpatentable over Guck in view of Ferrel is overcome. Applicant respectfully requests that the rejection of claims 2-7, 11-14 and 16-19 be reconsidered and withdrawn.

An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully submitted,

Date: March 17, 2006

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